

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**EASTERN PROFIT CORPORATION  
LIMITED,**

**Plaintiff,**

**-against-**

**STRATEGIC VISION US, LLC,**

**Defendant-Counterclaim Plaintiff.**

**Case No. 18-CV-2185 (JGK)**

**[PROPOSED] ORDER TO SHOW  
CAUSE AS TO BARTON LLP'S  
MOTION TO WITHDRAW AS  
COUNSEL TO DEFENDANT-  
COUNTERCLAIM PLAINTIFF**

UPON the annexed Declaration of James J. McGuire, Esq. and accompanying Memorandum of Law, both dated June 11, 2019, and all proceedings herein, and upon due deliberation and sufficient cause shown,

**IT IS ORDERED** that plaintiff Eastern Profit Corporation Limited ("Eastern") and defendant-counterclaim plaintiff Strategic Vision US, LLC ("Strategic") show cause before Honorable John G. Koeltl, in Courtroom 14A of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York at \_\_\_\_\_ on \_\_\_\_\_, 2019, or as soon thereafter as counsel may be heard, as to why an Order should not be entered herein, as follows:

- a) Permitting Barton LLP to withdraw as counsel to Strategic; and
- b) Granting such other and further relief as the Court may deem just and proper.

**IT IS FURTHER ORDERED** that, pending the hearing upon this Order to Show Cause, this action is stayed.

Copies of this Order, together with the paper annexed hereto, shall be served by overnight courier services (e.g., Federal Express, UPS, DHL, etc.) upon defendant-counterclaim plaintiff

Strategic at Strategic Vision US, LLC, c/o French Wallop, CEO, 1557 22<sup>nd</sup> Street North, Arlington, Virginia 22209 and by e-filing and email on counsel to plaintiff, Zachary B. Grendi, Esq., at [zgrendi@zeklaw.com](mailto:zgrendi@zeklaw.com), on or before \_\_\_\_\_, 2019. Answering papers, if any, by plaintiff shall be served by email upon [jmcguire@bartonesq.com](mailto:jmcguire@bartonesq.com) and [mberube@bartonesq.com](mailto:mberube@bartonesq.com) and by e-filing and by defendant-counterclaim plaintiff Strategic by overnight courier services (*e.g.*, Federal Express, UPS, DHL, etc.) upon James J. McGuire, Esq. and Mark A. Berube, Esq. at Barton LLP, 711 Third Avenue, 14<sup>th</sup> Floor, New York, New York 10017 on or before \_\_\_\_\_, 2019, and reply papers, if any, shall be served upon plaintiff by email and e-filing and upon defendant-counterclaim plaintiff Strategic by overnight courier services (*e.g.*, Federal Express, UPS, DHL, etc.) at Strategic Vision US, LLC, c/o French Wallop, CEO, 1557 22<sup>nd</sup> Street North, Arlington, Virginia 22209 on or before \_\_\_\_\_, 2019.

Dated: New York, New York  
June \_\_\_\_\_, 2019

SO ORDERED:

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**John G. Koeltl, U.S.D.J.**